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April 5, 2019

**BYECF AND ELECTRONIC MAIL**

The Hon. Cathy Seibel  
United States District Judge  
United States District Court  
for the Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Berger v. Imagina Consulting (18 Civ. 8956 (CS)(JCM))

Dear Judge Seibel:

I represent the defendant Imagina Consulting Inc. in this action.

I write pursuant the Court's Individual Practices and Local Civil Rule 37.2 to request that the Court conduct an informal conference in advance of my making a motion for discovery sanctions under FRCP 37.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Craig J. Albert", with a large, stylized flourish extending from the end of the signature.

Craig J. Albert

Copy to Richard Liebowitz, Esq. (via ECF and email)